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May 29, 2019

Natalie K. Creed, Hazardous Waste Bureau Chief  
*Waste Management & Remediation Program Office*  
Division of Environmental Quality  
1410 North Hilton  
Boise, ID 83706-1255

**RE: US Ecology Idaho, Inc. (USEI) – IDD073114654**  
**Permit Conditions I.E.5 and I.E.6: Clean Copies of Revised Relevant Portions of USEI's**  
**Part B RCRA Permit and Updated Attachment 26**

Dear Ms. Creed:

In accordance with the USEI RCRA Part B Permit (Permit Conditions I.E.5 and I.E.6), this letter is submitted to provide clean copies of the relevant portions, including an updated Attachment 26, of USEI's RCRA Part B Permit, following the submittal of USEI's May 06, 2019 Class 1 Permit Modification.

Attachment 26 is the permit modification tracking log. This log will be updated and submitted with each modification that is approved. Clean copies of relevant documents, including Attachment 26, have been included as an attachment to this letter.

If there are any additional questions or comments concerning this submittal please do not hesitate to call me or Rebecca Hogaboam at (208) 834-2275.

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.*

Regards,

A handwritten signature in dark ink, appearing to read "JE", with a stylized flourish at the end.

Jason Evens  
General Manager

Attachments

cc: Barbara McCullough-USEPA Region X (Electronic Copy)  
Garrett Bright - IDEQ

## Permit Modules

EFFECTIVE DATE: July 28, 2016  
MODIFICATION DATE: May 06, 2019

US ECOLOGY OF IDAHO  
PERMIT NUMBER: IDD073114654  
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- Attachment 19      Appendix D.5.9 – Geotechnical Engineering Report, of Permit Application, dated May 1, 2014.  
Appendix D.5.10 – Landfill Engineering Report Addendum Cell 16, of Permit Application, last revised July 6, 2017.  
Landfill Units - Design and Operation, consisting of:  
Subsections D-6 and D-11, Pages 1 through 27, including Table D-3, Appendices D.8.1, D.8.2, and Figures D-8 through D-11, as last revised November 18, 2017.  
See Attachment 20 for additional drawings for Trench 10 and 11, Cell 5, and Cell 14.
- Attachment 20      Master Book of Drawings, Overall Facility, consisting of:  
Master Book of Drawings, as last revised November 18, 2017.
- Attachment 21      Reserved for future use.
- Attachment 22      Past Practice Units, consisting of:  
Section J, Pages 1 through 25, including Tables J-1 through J-8, and Drawing PRMI-T05a, Revision B, of Permit Application as last revised April 25, 2017.
- Attachment 23      Exempt Radiological Materials Procedures Manual, consisting of:  
Section P, Exempt Radiological Materials Procedures Manual, and the following subsections:  
Safety Assessment,  
RESRAD Models,  
ERMP-01, Material Receipt Procedures,  
ERMP-02, Exempt Materials Procedures for Decontamination and Release of Empty Containers,  
ERMP-03, Environmental Monitoring Procedures,  
ERMP-04, Landfill Operations,  
ERMP-05, Waste Acceptance Criteria Evaluation,  
ERMP-06, Selection, Care and Use of Portable Instrumentation, and Drawing PRMI-T04 Windrose (Environmental Radiological Monitoring Locations), of Permit Application as last revised May 06, 2019.
- Attachment 24      Containment Building and Debris Treatment, consisting of:  
Section D.9, Pages 1 through 12, including Table D-1 and D-1A, of Permit Application as last revised August 28, 2015.  
See Attachment 20 for Additional Drawings for Containment Building.



Attachment 23  
ERMP-03

Table 3-1

Medium	Type	Locations	Frequency	Investigation Level
Air, Radon	Track-etch, passive	Fence line	Continuous, exchanged quarterly	2.0 pCi/l
Air, Radon Occupational	Track-etch	RTF, Cells 14, 15, and 16 while open  Container storage area- Pad at the least and most frequent down-wind directions	Continuous, Exchanged quarterly	400 pCi/l
Air Particulate-Non-Occupational	Active	Admin Area	Continuous (Filters replaced approximately every seven days)	$^{238}\text{U}$ - 0.3 pCi/m <sup>3</sup> $^{234}\text{U}$ - 0.1 pCi/m <sup>3</sup> $^{232}\text{Th}$ - 4.0E-4 pCi/m <sup>3</sup> $^{226}\text{Ra}$ - 0.09 pCi/m <sup>3</sup> $^{239}\text{Pu}$ - 3 x 10 <sup>-3</sup> pCi/m <sup>3</sup> $^{241}\text{Am}$ - 3 x 10 <sup>-3</sup> pCi/m <sup>3</sup> Any man-made gamma emitting Radionuclide- 20 pCi/m <sup>3</sup> Sum of all man-made gamma emitters not to exceed 200 pCi/m
Soil	Grab	Predominant downwind direction 50-100 ft. of either side of centerline	Semi-annually Spring and Fall	$^{238}\text{U}$ - 4 pCi/g $^{234}\text{U}$ - 4 pCi/g $^{232}\text{Th}$ - 4 pCi/g $^{226}\text{Ra}$ - 3 pCi/g $^{239}\text{Pu}$ - 0.06 pCi/g $^{241}\text{Am}$ - 0.06 pCi/g
Ground Water(filtered)	Grab	Three Monitoring Wells	Semi-annually Spring and Fall	Gross alpha-2.5 pCi/l <sup>1</sup> Gross Beta-25 pCi/l  $\text{Ra}^{226+228}$ - 5pCi/l Uranium - 30ug/L
Landfill Leachate	Grab	Active Landfill Sumps <sup>2</sup>	Annually	$^{36}\text{Cl}$ - 25pCi/L $^{99}\text{Tc}$ - 25pCi/L Gamma - Sum of all isotopes > 100pCi/L
Ambient Gamma	TLD, passive	Fence line	Continuous, exchanged quarterly	25 mrem/quarter

<sup>1</sup> Gross alpha investigation level excludes  $^{226+228}\text{Ra}$ , and Uranium concentrations, however,  $^{239}\text{Pu}$  and  $^{241}\text{Am}$  are included

<sup>2</sup> USEI will take an annual sample from landfill sumps where waste streams containing  $^{99}\text{Tc}$  and/or  $^{36}\text{Cl}$  have been deposited







## Attachment 26

ATTACHMENT 26 Permit Modification Tracking Log				
Date of Submittal	Modification	Date of Approval / Rejection	Date Pages Replaced	Initials
8/5/2016	Permit Condition II.S: Revised Figure F-2 to include weekend/holiday inspection of storage tanks.	5-Aug-16	5-Aug-16	
4/4/2017	Permit Condition II.S: Revised Table F-1 to include inspection of primary leak detection systems after 1/2" rain event in 24 hours.	4-Apr-17	4-Apr-17	
5/31/2017	Class 1 Modification: Revised Part A Permit Application	31-May-17	31-May-17	
7/21/2017	Class 2 Modification: Structural Stability and Remedial Improvements for Landfill Cell 14, Phase 1 Primary Leachate Risers	27-Sep-17	2-Nov-17	
10/11/2016	Class 3 Modification: Modified Cell 16 Design and Evaporation Pond Reconstruction	18-Nov-17	22-Nov-17	
4/2/2018	Class 1 Modification: Administrative Changes to Incorporate Well U-54 Construction Data and Figure F-24	2-Apr-18	2-Apr-18	
7/6/2018	Class 1 Prime Modification: Aisle Space Requirements and Marking of Containers for Off-Site Shipment	1-Aug-18	9-Aug-18	
1/24/2019	Class 2 Modification: Site Contingency Plan and Request to Undertake Direct Disposal Operations	3-Apr-19	23-Apr-19	
5/6/2019	Class 1 Modification: Administration Area Air Sample Location Change	15-May-19	15-May-19	